

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

IN RE:)	In Proceedings
)	Under Chapter 13
Claudia Webb)	Case No.23-16925
)	
Debtor(s).)	Honorable Judge Deborah L. Thorne

OBJECTION TO CONFIRMATION OF AMENDED CHAPTER 13 PLAN

NOW COMES BMO Bank N.A., by and through its undersigned attorney, on its Objection to Confirmation of Amended Chapter 13 Plan, and in support thereof states as follows:

1. BMO Bank N.A. has a security interest in one 2017 Toyota Sienna Passenger Van XLE AWD 3.5L V6, VIN 5TDDZ3DC2HS167756, which was properly perfected by recording its lien on title.
(Please see Exhibit A & B.)
2. Debtor proposed Amended plan fails to provide for payment of BMO Bank N.A.'s secured claim with interest or for surrender of the motor vehicle.
3. BMO Bank N.A. alleges the value of said vehicle is \$24,825.00 pursuant to a NADA valuation.
(Please see Exhibit C.)
4. BMO Bank N.A. is requesting a minimum interest rate of 11.500%.

WHEREFORE, BMO Bank N.A. respectfully requests this Court of entry of an Order denying confirmation and for such other and further relief as the Court deems just.

Respectfully submitted,

/s/ Jennifer Rinn

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**NOTICE OF OBJECTION TO CONFIRMATION OF AMENDED CHAPTER 13 PLAN
AND CERTIFICATE OF SERVICE**

*AN OBJECTION TO CONFIRMATION OF AMENDED CHAPTER 13 PLAN HAS BEEN FILED.

Please be advised that the attached objection to confirmation of amended chapter 13 plan shall be presented on May 02, 2024, at 10:30 AM before the Honorable Deborah L. Thorne at Appear in Courtroom 682, 219 S. Dearborn St, Chicago, IL 60604, or Using Zoom - Judge Thorne pursuant to the notice generated by the court on April 25, 2024, to the following parties:

Via CM / ECF / NEF

Glenn B Stearns
801 Warrenville Road Suite 650
Lisle, IL 60532
stearns_g@lisle13.com

Patrick S Layng
219 S Dearborn St, Room 873
Chicago, IL 60604
USTPRegion11.ES.ECF@usdoj.gov

Vaughn A White
1755 Park St, Suite 200
Naperville, IL 60563
vaughn@vaughnwhite.com

The objection was further served by depositing a printed copy into the US Mail on April 25, 2024, with postage prepaid at the address listed on the creditor matrix, upon the following parties, others not served:

Via US Mail

Claudia Webb
522 Buckley Court
University Park, IL 60484

/s/ *Cathy Bush*

/s/ Cathy Bush
4515 N. Santa Fe Ave.,
Oklahoma City, OK 73118